



To: Tanya Meeth, DWR Division of IRWM  
From: Bill Jacoby, Consultant to San Luis Delta Mendota Water Authority  
Date: April 23, 2010  
RE: Comments on the Draft IRWM Guidelines and Draft Project Solicitation Packages

The San Luis & Delta-Mendota Water Authority (SLDMWA) is updating their Westside Integrated Water Resources Plan (WIWRP.) As part of that process we have undertaken a review of the DWR Draft IRWM Grant Program Guidelines and the three accompanying Project Solicitation Packages (PSPs.)

The SLDMWA offers the following questions and observations:

1. Adding projects to WIWRP project list

SLDMWA has implemented a process to assure greater participation by disadvantaged communities (DACs) in the WIWRP update. Additionally, SLDMWA has been contacted by other water purveyors within our service area about the WIWRP update. As a result of the process, an extensive list of projects that will benefit both DACs and regional water planning efforts has been developed. The number and variety of projects make it most challenging to complete and adopt an update of the entire WIWRP by summer 2010. Many of the projects on the list look to be good candidates to qualify for funding under the Implementation Grant PSP. The SLDMWA is very interested in these projects meeting the eligibility criteria in the draft PSPs.

- A. How might these DAC and other water purveyor projects be determined eligible for the PSP prior to the full WIWRP update process being completed?
- B. Can any of these new projects be considered for eligibility before and contingent upon being priority ranked?
- C. Must SLDMWA be the agency submitting the proposal, or could individual water agencies submit proposals?
- D. SLDMWA is not a retail urban water provider, so would all agencies with projects on the DACs list need to meet the requirements of AB 1420 to be considered for funding? If so, this would be a harsh requirement for some of California's most disadvantaged small communities with very limited resources who are trying to address the serious water supply and quality needs of their communities.

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If the SLDMWA Board of Directors took action passing a resolution amending the IRWM to allow the project list to be updated per the requirements of the IRWM Grant Program Guidelines, would SLDMWA meet DWR requirements to update the project list to include new projects?

## 2. Planning grant PSP

As the SLDMWA updates its WIWRP, supplemental grant funding from DWR would be helpful to meet the expanded scope of the WIWRP and challenging new requirements included in the most recent draft IWRM guidelines. Grant funding for the planning effort would be helpful in meeting these challenges. However, we have the following questions:

- A. The PSP states that an agency may receive a grant up to 50% of the IRWM update costs and notes that funds spent on update work since September 30, 2008 may be considered as matching funds. Would the funds already spent by SLDMWA on the DACs survey to identify potential projects for the WIWRP update likely meet the criteria?
- B. SLDMWA is not a retail urban water supplier and much of the urban water used in the WIWRP area is groundwater. Additionally, all planning grant funds would be used by SLDMWA to aid the small urban retailers in the area and not by the small urban retailers directly. Therefore, would there be any AB 1420 compliance requirement involved with this grant?
- C. Exhibit A, Funding Match Information, Example 2 includes a list of expenses that could potentially be grant funded. Item #8 on that list is "Quarterly and Final Reports." Would this include the cost of generating quarterly and annual reports for grants received through both the implementation grants and storm water flood grants PSPs as well as other State grants for WIWRM projects?

Thank you for your consideration of these issues and questions.